June 26, 2015

Ms. Julie Saare-Edmonds
Water Use Efficiency Unit
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Re: Comments on the Modified Text of Proposed Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds:

Thank you for the opportunity to comment on the proposed changes to the Model Water Efficient Landscape Ordinance whose modification is mandated by Governor Brown via Executive Order B-29-15. Western Municipal Water District (Western) is a strong advocate of water use efficiency and the reduction of water waste.

In reviewing the updated proposed Model Water Efficient Landscape Ordinance, Western would like to comment on the following proposed revisions:

1. Definitions (490)
   To clarify some of the language introduced in the proposed revisions, please define "watershed approach" and "regenerative landscape systems."

2. Irrigation Efficiency (490, 492.13)
   Western recommends maintaining the 0.71 irrigation efficiency factor. The proposed changes make the distribution uniformity requirements either impossible (for commercial), or unattainable (for residential). Irrigation management is more of a problem than irrigation efficiency, and a factor of 0.71 adequately addresses irrigation efficiency.

3. Irrigation Precipitation Rate (492.7)
   Requiring a maximum precipitation rate of 1.0 gallon per hour does not take into account common situations where a higher precipitation rate is warranted. Higher precipitation rate nozzles allow for the soaking of mulch and thatch. They outperform lower precipitation rate nozzles in wind and high evaporation environments. Very few soil texture classes have an infiltration rate that exceeds even the lowest precipitation rate nozzles currently on the market.

Therefore, it is irrigation management that is the primary cause of runoff, not precipitation rates. Irrigation management is addressed in the ordinance in section 492.10.

4. Pressure Regulation (492.7)
   Western is in full support of requiring pressure regulation on all irrigation systems.

5. Flow Sensing (492.7)
   Requiring flow sensing on *all* irrigation systems will be cost prohibitive and unnecessary. The approximate cost for a flow sensor and appropriate controller is $1,000. This is not feasible for a typical residential landscape. Additionally, the product that is currently on the market does not have the sensitivity for sensing minor flow changes. For example, a flow sensor on a 2" mainline will likely not detect a flow change from a ½" nozzle. Western recommends flow sensing on projects with 24 irrigation stations or greater.

6. Plant Factors (492.4)
   Western has overseen many landscape plan checks. In almost every instance, a designer has used the lowest possible plant factor allowed in the designated range in order to calculate a low Estimated Total Water Use (ETWU). For example, one is allowed to choose from zero to 0.3 for the low water use plant factor. Using a plant factor of 0 in the ETWU formula can produce a significantly more favorable outcome in meeting water use goals than using a plant factor of 3. Western recommends creating a table that mandates one factor for each category. A suggestion: no supplemental water use (only stored rainwater water or rainwater) = 0, low water use = 0.2, moderate water use = 0.5, high water use = 0.8.

Plant Water Use	Plant Factor
No supplemental water needed	0
Low water use	0.2
Moderate water use	0.5
High water use	0.8

7. Turf Prohibition in Medians (491)
   Western is in complete agreement that turf should not be allowed in medians. Traffic creates wind that constantly distorts irrigation distribution uniformity. Eliminating runoff is nearly impossible unless subterranean drip is used (which has long-term maintenance issues). Disallowing turf in medians provides additional benefits: Trees are commonly planted in medians. Trees grow much healthier when they are not competing with turfgrass. Worker safety is enhanced by eliminating the need to haul and use various types of motorized maintenance equipment adjacent to traffic.

8. Compost Requirement (492.6)
   The proposed revisions to the ordinance encourage the use of local native plant species. When using local native species it is detrimental to alter the soil. Therefore, adding compost to the soil is NOT recommended in landscapes of local native species. (See http://rsabg.org/hidden-horticulture/32-native-gardening/868-soil-amendments).

9. Dedicated Landscape Meters (492.7)
   Western would like to see dedicated landscape meters required on all commercial landscapes regardless of size, and for residential greater than 5,000 square feet only in new construction, not rehabilitated residential landscapes.

10. Trees irrigated on separate valves (492.7)
    Providing a separate valve for the irrigation of trees is not necessary and adds to the cost of a project. It is almost impossible to irrigate plants separately from trees if they are in the same planter. A healthy tree will have roots throughout a planter. Both shrubs and trees will receive each other's irrigation water.

11. Enforcement (495)
    In areas where jurisdictional agencies have water budget rates (individualized customer water budgets), allow these types of water rates to fullfill the required ongoing compliance of the ordinance. These types of rates have been proven to stimulate and maintain significant water use reductions. By allowing these types of rates to be used as an incentive within the ordinance, their use will be encouraged.

Western would like to acknowledge the significant effort the Department of Water Resources has put forth in updating the State of California Model Water Efficient Landscape Ordinance.

Thank you for your consideration. Please feel free to contact Western or Pam Pavela, Water Use Efficiency Specialist at (951) 571-7236, ppavela@wmwd.com, if you have any questions or need clarification.

Sincerely,

CRAIG MILLER
Deputy General Manager
Western Municipal Water District